

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, *et al.*,  
individually and on behalf of a class of all others  
similarly situated,

Plaintiffs,

v.

CITY OF BUFFALO, N.Y., *et al.*,

Defendants.

No. 1:18-cv-00719-CCR

**STIPULATED MOTION TO EXTEND EXPERT DISCOVERY DEADLINE**

The Parties respectfully move to amend the scheduling order to extend the expert discovery deadline from October 4, 2024 to October 14, 2024.

1. Under the present schedule, the expert discovery deadline is October 4, 2024.
2. The Parties have completed the expert depositions of Professor Robert Silverman and Dr. David Banks. The Parties have also agreed to the scheduling of the expert deposition of Michael Gennaco on October 4.
3. Due to illness of one of the witnesses and unforeseen scheduling conflicts, the Parties are unable to complete the expert depositions of Dr. David Bjerk and Steven Nigrelli before the October 4 expert discovery deadline. The Parties have agreed to the scheduling of Dr. Bjerk's deposition on October 8 and Mr. Nigrelli's deposition on October 11. To allow sufficient time for the Parties to complete these two remaining expert depositions, the Parties respectfully request that the Court extend the expert discovery deadline.

WHEREFORE, the Parties respectfully request that the Court modify the schedule as proposed.

Dated: October 2, 2024

Respectfully Submitted,

/s/ Jordan Joachim

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 2, 2024, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Western District's Local Rules, and/or the Western District's Case Filing Rules & Instructions upon all counsel registered through the ECF System.

/s/ Jordan Joachim